

July 18, 2023

VIA ECF

The Honorable Sarah L. Cave
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *Catherine McKoy, et al. v. The Trump Corporation, et al.*, 18-cv-09936 (LGS) (SLC)

Dear Judge Cave:

The parties respectfully submit this joint letter-motion under Rule I.D of the Court's Individual Practices in Civil Cases to request a 17-day extension of the deadline to depose non-party witnesses Al Plumb, Devonne Richardson, John Barringer, and Angelique Davis (the "Defense Witnesses"). ECF 614.

On June 22, 2023, the Court granted Plaintiffs' application for leave to depose the Defense Witnesses, and directed that the depositions be completed by July 24, 2023, and that Plaintiffs certify the completion of the depositions on July 25, 2023. *Id.* That afternoon, Plaintiffs reached out to Defendants, asking for available dates and whether the witnesses were represented by counsel, and noting that Plaintiffs would proceed shortly with service. The following Tuesday, counsel for Defendants explained that he was in contact with ACN's counsel to coordinate scheduling and suggested that Plaintiffs hold off on serving deposition subpoenas to facilitate that process. Two days later, ACN's counsel contacted Plaintiffs and on Friday, July 7, ACN's counsel began providing available dates for the Defense Witnesses, all of which were in August. All counsel have met and conferred to coordinate locations and availability, and have now agreed to the following schedule:

Witness	Proposed Date
Al Plumb	August 2, 2023
Angelique Davis	August 2, 2023
John Barringer	August 8, 2023
Devonne Richardson	August 10, 2023

In view of the foregoing, the parties jointly seek a 17-day extension of the deadline for completing depositions of the Defense Witnesses. *Id.* Under the parties' proposed schedule, the depositions would be completed by August 10, 2023, and the letter certifying their completion would be due August 11, 2023.

Respectfully submitted,

/s/ John C. Quinn

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